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July 18, 2018

BY ECF

Honorable Edgardo Ramos United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Evans, et al., 17 CR 684 (ER)

Dear Judge Ramos:

I am writing on behalf of all defendants and jointly with the government to respectfully request an adjournment of the pretrial motion schedule in this case, which would have the defendants filing their initial briefs on or before October 15, 2018, the government's response on or before November 16, 2018, and any reply by the defendants on or before November 30, 2018. The reason for this lengthy extension is twofold: first, the government has continued to produce voluminous discovery and we have recently been notified that hard drives containing some 48,925 pages of additional materials will be delivered to the defendants this week. Second, the government has requested that they be permitted to respond to the defendants' motions – which will be made in a joint fashion to the extent practicable – after the trial in United States v. Gatto, et al., 17 CR 686 (LAK), which is set to begin on October 1, 2018 before Judge Kaplan and anticipated to last approximately four weeks. Finally, this request would not disturb the April 2019 trial set for this case – leaving a sufficient opportunity for any pretrial hearings should they be required.

Thank you for your consideration on this matter. I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,

Jeffrey Lichtman

All counsel (by ECF)

cc: